

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

**CONSOLIDATED INDUSTRIES, LLC
d/b/a WEATHER KING PORTABLE
BUILDINGS,**

Plaintiff,

v.

**JESSE A. MAUPIN, BARRY D.
HARRELL, ADRIAN S. HARROD,
LOGAN C. FEAGIN, STEPHANIE L.
GILLESPIE, RYAN E. BROWN, DANIEL
J. HERSHBERGER, BRIAN L. LASSEN,
ALEYNA LASSEN, and AMERICAN
BARN CO., LLC,**

Defendants.

Civil Action No. 1:22-cv-01230

**PLAINTIFF’S FIRST SET OF INTERROGATORIES, REQUESTS FOR
PRODUCTION OF DOCUMENTS, AND REQUESTS FOR ADMISSION TO
DEFENDANT AMERICAN BARN CO., LLC**

Pursuant to Fed. R. Civ. P. 26, 33, 34, and 36, Plaintiff Consolidated Industries, Inc. d/b/a Weather King Portable Buildings (“Weather King”) serves the following First Set of Interrogatories, Requests for Production of Documents, and Requests for Admission upon Defendant American Barn Co., LLC. Each interrogatory is to be answered separately and fully in writing, under oath, and signed by you within thirty (30) days of this request. Responses to the requests for admission are due within thirty (30) days, and responsive documents are to be served with the written responses and said documents to be produced within thirty (30) days of this request.

DEFINITIONS

(a) The terms “ABCO,” “you” and “your” mean Defendant American Barn Co., LLC, together with its subsidiaries, predecessors, incorporators/planners, officers, employees, agents, and representatives.

(b) The terms “Plaintiff” and “Weather King” shall mean Plaintiff Consolidated Industries, LLC d/b/a Weather King Portable Buildings.

(c) The term “the Portable Buildings Industry” shall mean the business of manufacturing, selling, marketing, distributing, leasing, renting, and/or consigning portable buildings (including but not limited to barns, sheds, and utility buildings) and associated warranty repair work, along with the sale or transfer of contracts, promissory notes or commercial paper associated with portable buildings.

(d) The term “communication” means any oral or written utterance, notation, or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, correspondence, conversations, dialogues, discussions, messaging, interviews, consultations, agreements, and other understanding between or among two (2) or more persons.

(e) The word “document” means the original and each non-identical copy of any written, reported or graphic matter, however produced or reproduced, in the possession, custody or control of, or known to, plaintiff, her agents, representatives, attorneys or other persons acting on her behalf. Without limiting the generality of the foregoing, the word “document” includes e-mail, voice mail, electronic bulletin board postings, social media communications, and any information stored on and reproducible in documentary form from a computer or other electronic, magnetic, optical, laser-based information, or remote storage device, including but not limited to

floppy disks, hard disks, tapes, CD-ROMs, external hard drives, flash or “zip” drives, or remote or “cloud” storage locations.

(f) The terms “identify” or “identity” mean, with respect to persons, to state the full name, present or last known address, current or last known employment and position or title therein, and telephone number; and with respect to documents, said terms shall mean to state the general nature of the document (for example, letter, email, telegram, photograph or memorandum), the date, the author, the addressee, and the location and custodian of the document.

INTERROGATORIES

1. Identify each person or entity who played a role in planning ABCO’s creation or formation and, for each such person/entity: (a) set forth the role each person/entity played; and (b) set forth the dates in which the person/entity helped plan the creation/formation.

RESPONSE:

2. Identify each person or entity who has served as an owner or member of ABCO and, for each such person/entity : (a) set forth the position/title each person has held; (b) set forth the ownership interest each person has held; and (c) set forth the dates in which the person held such title and ownership interest.

RESPONSE: